# **Statement of Basis of the Federal Operating Permit**

Arkema Inc.

Site Name: Beaumont Facility
Area Name: Beaumont Facility Chemical Manufacturing
Physical Location: 2810 Gulf States Road
Nearest City: Beaumont
County: Jefferson

Permit Number: O1636 Project Type: Renewal

Standard Industrial Classification (SIC) Code: 2869 SIC Name: Industrial Organic Chemicals

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

A description of the facility/area process description;

A basis for applying permit shields;

A list of the federal regulatory applicability determinations;

A table listing the determination of applicable requirements;

A list of the New Source Review Requirements;

The rationale for periodic monitoring methods selected;

The rationale for compliance assurance methods selected;

A compliance status; and

A list of available unit attribute forms.

Prepared on: April 4, 2016

# Operating Permit Basis of Determination

#### **Permit Area Process Description**

Arkema operates a mercaptan production facility and a hydrogen sulfide unit. The emission control devices at the site consist of 1) the plant thermal incinerator, which controls process vents from normal mercaptan production activities, 2) the plant Thermal Oxidizer which controls process vents from normal Acrolein and MPP production activities, and 3) the plant flare, which handles emissions from certain plant operations as well as emergencies and upsets. In addition, there are associated process reactors, distillation, fugitive emission sources, product and raw material storage, product loading and shipping, and support facilities. The facility also includes a second wastewater vaporizer which is used to provide a back up system during maintenance and unscheduled down time of the primary wastewater vaporizer unit.

#### **FOPs at Site**

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

### **Major Source Pollutants**

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	SO2, NOX
1	

# **Reading State of Texas's Federal Operating Permit**

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
  - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
  - Additional Monitoring Requirements
  - New Source Review Authorization Requirements
  - Compliance Requirements
  - Protection of Stratosphere Ozone
  - o Permit Location
  - o Permit Shield (30 TAC § 122.148)
- Attachments
  - o Applicable Requirements Summary

- Unit Summary
- Applicable Requirements Summary
- Additional Monitoring Requirements
- o Permit Shield
- New Source Review Authorization References
- o Compliance Plan
- Alternative Requirements
- Appendix A
  - o Acronym list
- Appendix B
  - Copies of major NSR authorizations

#### **General Terms and Conditions**

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

# **Special Terms and Conditions**

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

#### Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often

required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

#### Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

#### Appendix B

Copies of major NSR authorizations applicable to the units covered by this permit have been included in this Appendix, to ensure that all interested persons can access those authorizations.

# Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3.A. for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce

visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

# **Federal Regulatory Applicability Determinations**

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	Yes
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	Yes
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CAIR (Clean Air Interstate Rule)	No

#### **Basis for Applying Permit Shields**

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A

permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

# **Insignificant Activities**

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

- 1. Office activities such as photocopying, blueprint copying, and photographic processes.
- 2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
- 3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
- 4. Outdoor barbecue pits, campfires, and fireplaces.
- 5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
- 6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
- 7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
- 8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
- 9. Vehicle exhaust from maintenance or repair shops.
- 10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
- 11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
- 12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
- 13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 15. Well cellars.
- 16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
- 17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
- 18. Equipment used exclusively for the melting or application of wax.
- 19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
- 20. Shell core and shell mold manufacturing machines.
- 21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
- 22. Equipment used for inspection of metal products.
- 23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
- 24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
- 25. Battery recharging areas.

# **Determination of Applicable Requirements**

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at <a href="https://www.tceq.texas.gov/permitting/air/nav/air\_all\_ua\_forms.html">www.tceq.texas.gov/permitting/air/nav/air\_all\_ua\_forms.html</a>.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at

www.tceq.texas.gov/permitting/air/nav/air\_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

# **Operational Flexibility**

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need

to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

# **Determination of Applicable Requirements**

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRP-	30 TAC Chapter	R7ICI	Horsepower Rating = HP is greater than or equal to 300	
FWPUMP	117, Subchapter B		RACT Date Placed in Service = After June 9, 1993 and before the final compliance date specified in 30 TAC §§ 117.9000, 117.9010 or 117.9020	
			Functionally Identical Replacement = Unit is not a functionally identical replacement	
			Type of Service = Demonstrated to operate less than 850 hours per year, based on a rolling 12-month average	
GRP- FWPUMP	40 CFR Part 60, Subpart IIII	60IIII-01	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification on or before July 11, 2005.	
GRP- FWPUMP	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-01	HAP Source = Any stationary source of hazardous air pollutants that is not a major source as defined in 40 CFR § 63.2.	
			Brake HP = Stationary RICE with a brake HP greater than or equal to 300 HP and less than or equal to 500 HP.	
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.	
			Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.	
			Service Type = Emergency use where the RICE does not operate or is not contractually obligated to be available for more than 15 hours per calendar year as specified in 40 CFR §63.6640(f)(2)(ii)-(iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).	
			Stationary RICE Type = Compression ignition engine	
GRP-GEN1	40 CFR Part 60, Subpart IIII	60IIII-02	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after July 11, 2005.	
			Diesel = Diesel fuel is used.	
			Kilowatts = Power rating is greater than or equal to 75 KW and less than 130 KW.	
			Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement.	
			Displacement = Displacement is less than 10 liters per cylinder.	
			Service = CI ICE is an emergency engine.	
			Standards = The emergency CI ICE meets the standards applicable to non-emergency engines.	
			Commencing = CI ICE that is commencing new construction.	
			Compliance Option = The CI ICE and control device is installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions.	
			Manufacture Date = Date of manufacture is after 04/01/2006.	
			Model Year = CI ICE was manufactured in model year 2009.	
GRP-GEN1	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-02	HAP Source = Any stationary source of hazardous air pollutants that is not a major source as defined in 40 CFR § 63.2.	
			Brake HP = Stationary RICE with a brake HP greater than or equal to 100 HP and less than 250 HP.	
			Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.	
GRP-GEN2	40 CFR Part 60, Subpart IIII	60IIII-03	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after July 11, 2005.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Diesel = Diesel fuel is used.	
			Kilowatts = Power rating is greater than 368 KW and less than 600 KW.	
			Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement.	
			Displacement = Displacement is greater than or equal to 20 and less than 25 liters per cylinder.	
			Service = CI ICE is an emergency engine.	
			Standards = The emergency CI ICE meets the standards applicable to non-emergency engines.	
			Commencing = CI ICE that is commencing new construction.	
			Compliance Option = The CI ICE and control device is installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions.	
			Manufacture Date = Date of manufacture is after 04/01/2006.	
			Model Year = CI ICE was manufactured in model year 2009.	
GRP-GEN2	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-03	HAP Source = Any stationary source of hazardous air pollutants that is not a major source as defined in 40 CFR § 63.2.	
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.	
			Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.	
D310	30 TAC Chapter	R5112	Construction Date = On or after May 12, 1973	
	115, Storage of VOCs	orage of	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using an internal floating roof (IFR)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
D310	40 CFR Part 60,	60Kb	Product Stored = Volatile organic liquid	
	Subpart Kb		Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
		Maximum True Vapor Pr	Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using two seals mounted one above the other to form a continuous closure	
D9867	30 TAC Chapter	R5112	Construction Date = On or after May 12, 1973	
	115, Storage of VOCs	S, Storage of Alternate Control	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is less than 1.0 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons	
D9868	30 TAC Chapter	R5112	Construction Date = On or after May 12, 1973	
	115, Storage of VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is less than 1.0 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons	
GRP-EFR	30 TAC Chapter 115, Storage of	R5112	Construction Date = On or after May 12, 1973  Today's Date = Today's date is March 1, 2013 or later.	
	VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous	
			compliance with applicable control requirements or exemption criteria.	
			Tank Description = Welded tank using an external floating roof	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Primary Seal = Mechanical shoe	
			Product Stored = VOC other than crude oil or condensate	
			Secondary Seal = Secondary seal not determined since 30 TAC §§ 115.117(a)(4) or 115.117(b)(4) exemption is not utilized	
			Storage Capacity = Capacity is greater than 40,000 gallons	
GRP-EFR	40 CFR Part 60,	60KB	Product Stored = Volatile organic liquid	
	Subpart Kb	Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)  Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1	Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
			Storage Vessel Description = Pontoon-type or double-deck-type external floating roof with mechanical shoe primary seal	
GRP-HFR	30 TAC Chapter	R5112	Construction Date = On or after May 12, 1973	
	115, Storage of VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Other control device	
GRP-HFR	40 CFR Part 60,	60Kb	Product Stored = Volatile organic liquid	
	Subpart Kb		Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
		Maximum True Vapor Pressure = True vapor pressure is g	Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia	
			Storage Vessel Description = CVS and control device other than a flare (fixed roof)	
GRP-LOAD	30 TAC Chapter	R-5211	Chapter 115 Control Device Type = Vapor control system with a flare.	
	115, Loading and Unloading of VOC	5, Loading and	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.	
			Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.	
			Vapor Tight = Not all liquid and vapor lines are equipped with fittings which make vapor-tight connections that	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			close automatically when disconnected.	_
			Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.	
			Transfer Type = Only loading.	
			True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia.	
			Daily Throughput = Loading greater than or equal to 20,000 gallons per day.	
			Control Options = Vapor balance system.	
H202	30 TAC Chapter	R7ICI	Diluent CEMS = The process heater does not use a carbon dioxide CEMS to monitor diluent.	
	117, Subchapter B		Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a).	
			Unit Type = Process heater	
			30 TAC Chapter 116 Limit = $NO_x$ emission limit in 30 TAC § 117.105 is not greater than the $NO_x$ emission limit in a 30 TAC Chapter 116 permit	
		CO Emission Limitation = Title 30 TAC § 117.105(f)  Maximum Rated Capacity = MRC is less than 40 MMBtu/hr.		
			CO Monitoring System = Emissions are monitored using methods other than CEMS or PEMS.	
			NOx Emission Limit Basis = Emission limit basis is not a 30 day rolling average or a block one-hour average	
			RACT Date Placed in Service = On or before November 15, 1992	
			NOx Reduction = No NO <sub>x</sub> control method	
			Common Stack Combined = Unit is not vented through a common stack, or the total rated heat input from combined units is at less than 250 MMBtu/hr or the annual combined heat input is less than 2.2(1011) Btu/yr.	
			Fuel Type #1 = Natural gas	
			NOx Monitoring System = Maximum emission rate testing [in accordance with 30 TAC § 117.8000]	
			NOx Emission Limitation = Title 30 TAC § 117.105	
H2202	30 TAC Chapter	R7ICI	Diluent CEMS = The process heater does not use a carbon dioxide CEMS to monitor diluent.	
	117, Subchapter B		Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a).	
			Unit Type = Process heater	
			30 TAC Chapter 116 Limit = $NO_x$ emission limit in 30 TAC § 117.105 is not greater than the $NO_x$ emission limit in a 30 TAC Chapter 116 permit	
			CO Emission Limitation = Title 30 TAC § 117.105(f)	
			Maximum Rated Capacity = MRC is less than 40 MMBtu/hr.	
			CO Monitoring System = Emissions are monitored using methods other than CEMS or PEMS.	
			NOx Emission Limit Basis = Emission limit basis is not a 30 day rolling average or a block one-hour average	
			RACT Date Placed in Service = On or before November 15, 1992	
			$NOx Reduction = No NO_x control method$	
			Common Stack Combined = Unit is not vented through a common stack, or the total rated heat input from combined units is at less than 250 MMBtu/hr or the annual combined heat input is less than 2.2(1011) Btu/yr.	
			Fuel Type #1 = Natural gas	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			NOx Monitoring System = Maximum emission rate testing [in accordance with 30 TAC § 117.8000]	
			NOx Emission Limitation = Title 30 TAC § 117.105	
H401	30 TAC Chapter	R7ICI	Diluent CEMS = The process heater does not use a carbon dioxide CEMS to monitor diluent.	
	117, Subchapter B		Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a).	
			Unit Type = Process heater	
			30 TAC Chapter 116 Limit = $NO_x$ emission limit in 30 TAC § 117.105 is not greater than the $NO_x$ emission limit in a 30 TAC Chapter 116 permit	
			CO Emission Limitation = Title 30 TAC § 117.105(f)	
			Maximum Rated Capacity = MRC is less than 40 MMBtu/hr.	
			CO Monitoring System = Emissions are monitored using methods other than CEMS or PEMS.	
			NOx Emission Limit Basis = Emission limit basis is not a 30 day rolling average or a block one-hour average	
			RACT Date Placed in Service = On or before November 15, 1992	
			NOx Reduction = No NO <sub>x</sub> control method	
		Common Stack Combined = Unit is not vented through a common stack, or the total rated heat input from combined units is at less than 250 MMBtu/hr or the annual combined heat input is less than 2.2(10 <sup>11</sup> ) Btu/yr. Fuel Type #1 = Natural gas  NOx Monitoring System = Maximum emission rate testing [in accordance with 30 TAC § 117.8000]	Common Stack Combined = Unit is not vented through a common stack, or the total rated heat input from combined units is at less than 250 MMBtu/hr or the annual combined heat input is less than 2.2(1011) Btu/yr.	
			Fuel Type #1 = Natural gas	
			NOx Emission Limitation = Title 30 TAC § 117.105	
H501	30 TAC Chapter	R7ICI	Diluent CEMS = The process heater does not use a carbon dioxide CEMS to monitor diluent.	
	117, Subchapter B	Fuel Flow Monitoring = Fuel flow is monitori	Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a).	
			Unit Type = Process heater	
			30 TAC Chapter 116 Limit = $NO_x$ emission limit in 30 TAC § 117.105 is not greater than the $NO_x$ emission limit in a 30 TAC Chapter 116 permit	
			CO Emission Limitation = Title 30 TAC § 117.105(f)	
			Maximum Rated Capacity = MRC is less than 40 MMBtu/hr.	
			CO Monitoring System = Emissions are monitored using methods other than CEMS or PEMS.	
			NOx Emission Limit Basis = Emission limit basis is not a 30 day rolling average or a block one-hour average	
			RACT Date Placed in Service = On or before November 15, 1992	
			NOx Reduction = No NO <sub>x</sub> control method	
			Common Stack Combined = Unit is not vented through a common stack, or the total rated heat input from combined units is at less than 250 MMBtu/hr or the annual combined heat input is less than 2.2(10 <sup>11</sup> ) Btu/yr.	
			Fuel Type #1 = Natural gas	
			NOx Monitoring System = Maximum emission rate testing [in accordance with 30 TAC § 117.8000]	
			NOx Emission Limitation = Title 30 TAC § 117.105	
SULFOX-TO	30 TAC Chapter	R7ICI	NOx Emission Limitation = Title 30 TAC § 117.110(a)(1).	
	117, Subchapter B		Unit Type = Other industrial, commercial, or institutional boiler.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
_			Maximum Rated Capacity = MRC is greater than or equal to 40 MMBtu/hr but less than 100 MMBtu/hr.	
			NOx Monitoring System = Continuous emissions monitoring system.	
			Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a).	
			RACT Date Placed in Service = After June 9, 1993, and before the final compliance date specified in 30 TAC § 117.9000.	
			Chapter 116 Permit Limit = Emission limit in 30 TAC $\S$ 117.105 is not greater than the NO <sub>x</sub> emission limit in any 30 TAC Chapter 116 permit issued after June 9, 1993.	
			CO Emission Limitation = Title 30 TAC § 117.105(f).	
			Functionally Identical Replacement = Unit is not a functionally identical replacement.	
			CO Monitoring System = Continuous emissions monitoring system complying with 30 TAC § 117.8100(a)(1).	
			Fuel Type #1 = Natural gas.	
			NH3 Emission Limitation = Title 30 TAC § 117.105(g).	
			NOx Emission Limit Average = Emission limit in pounds/hour on a block one-hour average.	
			$NOx Reductions = No NO_x reduction.$	
			Annual Heat Input = Annual heat input is greater than 2.8(1011) Btu/yr, based on rolling 12-month average.	
			Common Stack Combined = The unit is not vented through a common stack; or the total rated heat input from combined units is less than 250 MMBtu/hr; and the annual combined heat input is 2.2(10 <sup>11</sup> ) Btu/yr or less.	
SULFOX-TO	40 CFR Part 60, Subpart Db	6oDb	Construction/Modification Date = Constructed or reconstructed after July 9, 1997, and on or before February 28, 2005.	
			Heat Input Capacity = Heat input capacity is less than or equal to 100 MMBtu/hr (29 MW).	
SULFOX-TO	40 CFR Part 60,	6oDc	Construction/Modification Date = After June 9, 1989 but on or before February 28, 2005.	Reporting - §60.48c(j) was
	Subpart Dc		PM Monitoring Type = No particulate monitoring.	removed from all pollutants due to burning natural gas
			Maximum Design Heat Input Capacity = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW).	and not coal or oil.
			SO2 Inlet Monitoring Type = Fuel certification (or maintaining receipts).	
			Other Subparts = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB.	
			$SO_2$ Outlet Monitoring Type = $No SO_2$ monitoring.	
			Heat Input Capacity = Heat input capacity is greater than 75 MMBtu/hr (22 MW).	
			Technology Type = None.	
			D-Series Fuel Type = Natural gas.	
			47C-Option = COMS exemption § 60.47c(f) for a facility that burns only gaseous fuels or fuel oils that contain less than or equal to 0.5 weight percent sulfur and operates according to a written site-specific monitoring plan approved by the permitting authority.	
			ACF Option - SO2 = Other ACF or no ACF.	
			ACF Option - PM = Other ACF or no ACF.	
			30% Coal Duct Burner = The facility does not combust coal in a duct burner as part of a combined cycle system; or more than 30% of the heat is from combustion of coal and less than 70% is from exhaust gases entering the duct burner.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
X426A 30 TAC Chapter 117, Subchapter B	R7ICI	NOx Emission Limitation = Title 30 TAC § 117.105 (relating to Emission Specifications for Reasonably Available Control Technology).		
			Unit Type = Other industrial, commercial, or institutional boiler.	
			Maximum Rated Capacity = MRC is less than 40 MMBtu/hr.	
			Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a).	
			Chapter 116 Permit Limit = $NO_x$ emission limit in 30 TAC § 117.105, is not greater than the $NO_x$ emission limit in a 30 TAC Chapter 116 permit.	
			CO Emission Limitation = Title 30 TAC § 117.105(f).	
			NH3 Emission Limitation = Title 30 TAC § 117.105(g).	
			NOx Emission Limit Average = Emission limit in pounds/hour on a block one-hour average.	
			$NOx Reductions = No NO_x reduction.$	
			Common Stack Combined = The unit is not vented through a common stack; or the total rated heat input from combined units is less than 250 MMBtu/hr; and the annual combined heat input is 2.2(1011) Btu/yr or less.	
X426A	40 CFR Part 60,	6oDB	Construction/Modification Date = On or after November 25, 1986, and on or before July 9, 1997.	
	Subpart Db		Heat Input Capacity = Heat input capacity is less than or equal to 100 MMBtu/hr (29 MW).	
X426A	40 CFR Part 60,	60Dc	Construction/Modification Date = On or before June 9, 1989.	
	Subpart Dc	PM Monitoring Type = No particulate monitoring.  Maximum Design Heat Input Capacity = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW).  SO2 Inlet Monitoring Type = Fuel certification (or maintaining receipts).  Other Subparts = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB.  SO2 Outlet Monitoring Type = No SO2 monitoring.  Heat Input Capacity = Heat input capacity is greater than 10 MMBtu/hr (2.9 MW) but less than 30 MMBtu/hr (8.7 MW).  Technology Type = None.	PM Monitoring Type = No particulate monitoring.	
			SO <sub>2</sub> Inlet Monitoring Type = Fuel certification (or maintaining receipts).	
			Technology Type = None.	
			D-Series Fuel Type = Natural gas.	
			ACF Option - SO2 = Other ACF or no ACF.	
			ACF Option - PM = Other ACF or no ACF.	
			30% Coal Duct Burner = The facility does not combust coal in a duct burner as part of a combined cycle system; or more than 30% of the heat is from combustion of coal and less than 70% is from exhaust gases entering the duct burner.	
X426B	30 TAC Chapter 117, Subchapter B	R7ICI	NOx Emission Limitation = Title 30 TAC § 117.105 (relating to Emission Specifications for Reasonably Available Control Technology).	
			Unit Type = Other industrial, commercial, or institutional boiler.	
			Maximum Rated Capacity = MRC is less than 40 MMBtu/hr.	
			Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a).	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Chapter 116 Permit Limit = $NO_x$ emission limit in 30 TAC § 117.105, is not greater than the $NO_x$ emission limit in a 30 TAC Chapter 116 permit.	
			CO Emission Limitation = Title 30 TAC § 117.105(f).	
			NH3 Emission Limitation = Title 30 TAC § 117.105(g).	
			NOx Emission Limit Average = Emission limit in pounds/hour on a block one-hour average.	
			$NOx Reductions = No NO_x reduction.$	
			Common Stack Combined = The unit is not vented through a common stack; or the total rated heat input from combined units is less than 250 MMBtu/hr; and the annual combined heat input is 2.2(10 <sup>11</sup> ) Btu/yr or less.	
X426B	40 CFR Part 60,	6oDB	Construction/Modification Date = On or after November 25, 1986, and on or before July 9, 1997.	
	Subpart Db		Heat Input Capacity = Heat input capacity is less than or equal to 100 MMBtu/hr (29 MW).	
X426B	40 CFR Part 60,	6oDc	Construction/Modification Date = On or before June 9, 1989.	
	Subpart Dc		PM Monitoring Type = No particulate monitoring.	
			Maximum Design Heat Input Capacity = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW).	
			SO2 Inlet Monitoring Type = Fuel certification (or maintaining receipts).	
			Other Subparts = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB.	
			SO <sub>2</sub> Outlet Monitoring Type = No SO <sub>2</sub> monitoring.	
			Heat Input Capacity = Heat input capacity is greater than 10 MMBtu/hr (2.9 MW) but less than 30 MMBtu/hr (8.7 MW).	
			Technology Type = None.	
			D-Series Fuel Type = Natural gas.	
			ACF Option - SO2 = Other ACF or no ACF.	
			ACF Option - PM = Other ACF or no ACF.	
			30% Coal Duct Burner = The facility does not combust coal in a duct burner as part of a combined cycle system; or more than 30% of the heat is from combustion of coal and less than 70% is from exhaust gases entering the duct burner.	
FLARE	30 TAC Chapter	R-1111	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.	
	111, Visible Emissions		Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.	
	Elinisolonis		Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.	
			Construction Date = Newest source routing emissions to the flare began construction after January 31, 1972.	
FLARE	40 CFR Part 60, Subpart A	R-1111	Subject to 40 CFR § 60.18 = Flare is not subject to 40 CFR § 60.18.	
FLARE	40 CFR Part 63, Subpart A	R-1111	Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.	
GRP-FUG1	30 TAC Chapter	R5352	Compressor Seals = The fugitive unit contains compressor seals.	
	115, Pet. Refinery & Petrochemicals		Flanges = The fugitive unit contains flanges.	
	& I etrochemicals		Open-ended Valves = The fugitive unit contains open-ended valves.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Pressure Relief Valves = The fugitive unit contains pressure relief valves.	
			Process Drains = The fugitive unit does not have process drains.	
			Pump Seals = The fugitive unit contains pump seals.	
			Rupture Disks = The fugitive unit has pressure relief valves equipped with rupture disks.	
			Title 30 TAC § 115.352 Applicable = Site is a petroleum refinery, synthetic organic chemical, polymer resin or methyl tert-butyl ether manufacturing process or a natural gas/gasoline processing operation as defined in 30 TAC 115.10.	
			Valves (other than pressure relief and open-ended) = The fugitive unit contains valves other than pressure relief valves or open-ended valves or lines.	
			Alternate Control Requirement = The TCEQ Executive Director has not approved an alternate method for demonstrating and documenting continuous compliance with an alternate control requirement or exemption criteria for pressure relief valves or no alternate has been requested.	
			Instrumentation Systems = The fugitive unit has instrumentation systems, as defined in 40 CFR § 63.161, that meet 40 CFR § 63.169.	
			Less Than 250 Components at Site = Fugitive unit not located at site with less than 250 fugitive components.	
			Sampling Connection Systems = The fugitive unit has sampling connection systems, as defined in 40 CFR $\S$ 63.161, that meet 40 CFR $\S$ 63.169.	
			Weight Percent VOC = All components contact a process fluid that contains greater than or equal to 10% VOC by weight.	
			Complying with 30 TAC § 115.352(1) = Process drains are complying with the requirements in 30 TAC § 115.352(1).	
			Reciprocating Compressors Or Positive Displacement Pumps = The fugitive unit does not have reciprocating compressors or positive displacement pumps used in natural gas/gasoline processing operations.	
			TVP 0.002 PSIA or Less = The fugitive unit does not have components or systems that contact a process fluid containing VOC having a true vapor pressure less than or equal to 0.002 psia at 68 degrees Fahrenheit.	
			TVP of Process Fluid VOC <= 0.044 PSIA AT 68° F = Process drains do not contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.	
			TVP of Process Fluid VOC $<= 0.044$ PSIA AT $68\Box^{\circ}$ F = Open-ended valves or lines do not contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.	
			Complying with 30 TAC § 115.352(1) = Pump seals are complying with the requirements in 30 TAC § 115.352(1).	
			TVP of Process Fluid VOC $<= 0.044$ PSIA AT $68\square^{\circ}$ F = Compressor seals do not contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.	
			TVP of Process Fluid VOC > 0.044 PSIA AT 68° F = Process drains contact a process fluid containing VOC having a TVP greater than 0.044 psia at 68 degrees Fahrenheit.	
			Complying With $\S$ 115.352(1) = Compressor seals are complying with the requirements in 30 TAC $\S$ 115.352(1).	
GRP-FUG1	40 CFR Part 60, Subpart VV	60VV-01	Closed Vent (or Vapor Collection) Systems = The fugitive unit does not contain closed vent or vapor collection systems.	
			Compressors = The fugitive unit contains compressors.	
			Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices.	
			Equipment in VOC Service = The fugitive unit contains equipment designed to operate in VOC service.	
			Flare = The fugitive unit contains flares.	
			Pressure Relief Devices in Heavy or Light Liquid Service = Fugitive unit contains pressure relief devices in heavy	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			or light liquid service.	
			Produces Chemicals = The fugitive unit is part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.	
			Pumps in Heavy Liquid Service = The fugitive unit does not contain pumps in heavy liquid service.	
			Sampling Connection Systems = The fugitive unit contains sampling connection systems.	
			Valves in Gas/Vapor or Light Liquid Service = The fugitive unit contains valves in gas/vapor or light liquid service.	
			Vapor Recovery System = The fugitive unit does not contain vapor recovery systems.	
			2.0% = The fugitive unit is not complying with an allowable percentage of valves leaking equal to or less than 2.0%.	
			Affected Facility = The fugitive unit is part of a facility that is an affected facility as defined in 40 CFR § 60.480(a)(2).	
			Equivalent Emission Limitation = No equivalent emission limitation is used for flares.	
			Vacuum Service = The fugitive unit does not contain equipment in vacuum service.	
			Construction/Modification Date = After January 5, 1981 and on or before November 7, 2006.	
			Equivalent Emission Limitation = No equivalent emission limitation is used for valves in gas/vapor or light liquid service.	
			VOC Service = Fugitive unit does not contain equipment designed to operate in VOC service less than 300 hours per year.	
			Compliance Option = Choosing to comply with the provisions of 40 CFR Part 60, Subpart VV.	
			Complying with 40 CFR § 60.482-10 = Flares are complying with § 60.482-10.	
			Complying with 40 CFR § 60.482-3 = Compressors are complying with § 60.482-3.	
			Complying with 40 CFR § 60.482-5 = Sampling connection systems are complying with § 60.482-5.	
			Complying with 40 CFR § 60.482-8 = Pressure relief devices in heavy or light liquid service are complying with the requirements of § 60.482-8.	
			Pumps in Light Liquid Service = The fugitive unit contains pumps in light liquid service.	
			Complying with 40 CFR § 60.482-7 = Valves in gas/vapor or light liquid service are complying with § 60.482-7.	
			Design Capacity = Site with a design capacity is greater than or equal to 1,000 Mg/yr.	
			Equivalent Emission Limitation = No equivalent emission limitation is used for pumps in light liquid service.	
			Flanges and Other Connectors = The fugitive unit contains flanges and other connectors.	
			Open-ended Valves or Lines = The fugitive unit contains open-ended valves or lines.	
			Pressure Relief Devices in Gas/Vapor Service = The fugitive unit contains pressure relief devices in gas/vapor service.	
			Valves in Heavy Liquid Service = The fugitive unit contains valves in heavy liquid service.	
			Equivalent Emission Limitation = No equivalent emission limitation is used for flanges and other connectors.	
			Produces Heavy Liquid Chemicals = The facility produces chemicals other than or in addition to heavy liquid chemicals only from heavy liquid feed or raw materials.	
			Beverage Alcohol Production = The facility does not produce only beverage alcohol.	
			Complying with 40 CFR § 60.482-2 = Pumps in light liquid service are complying with § 60.482-2.	
			Complying with 40 CFR § 60.482-6 = Open-ended valves or lines are complying with § 60.482-6.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Complying with 40 CFR § 60.482-8 = Flanges and other connectors are complying with § 60.482-8.	
			Equipment in VOC Service = The facility does not contain equipment designed to operate in VOC service.	
GRP-FUG3	30 TAC Chapter	R5352	Compressor Seals = The fugitive unit contains compressor seals.	
	115, Pet. Refinery & Petrochemicals		Flanges = The fugitive unit contains flanges.	
	& retrochemicals		Open-ended Valves = The fugitive unit contains open-ended valves.	
			Pressure Relief Valves = The fugitive unit contains pressure relief valves.	
			Process Drains = The fugitive unit does not have process drains.	
			Pump Seals = The fugitive unit contains pump seals.	
			Rupture Disks = The fugitive unit has pressure relief valves equipped with rupture disks.	
			Title 30 TAC § 115.352 Applicable = Site is a petroleum refinery, synthetic organic chemical, polymer resin or methyl tert-butyl ether manufacturing process or a natural gas/gasoline processing operation as defined in 30 TAC 115.10.	
			Valves (other than pressure relief and open-ended) = The fugitive unit contains valves other than pressure relief valves or open-ended valves or lines.	
			Alternate Control Requirement = The TCEQ Executive Director has not approved an alternate method for demonstrating and documenting continuous compliance with an alternate control requirement or exemption criteria for pressure relief valves or no alternate has been requested.	
			Instrumentation Systems = The fugitive unit has instrumentation systems, as defined in 40 CFR § 63.161, that meet 40 CFR § 63.169.	
			Less Than 250 Components at Site = Fugitive unit not located at site with less than 250 fugitive components.	
			Sampling Connection Systems = The fugitive unit has sampling connection systems, as defined in 40 CFR § 63.161, that meet 40 CFR § 63.169.	
			Weight Percent VOC = All components contact a process fluid that contains greater than or equal to 10% VOC by weight.	
			Complying with 30 TAC § 115.352(1) = Process drains are complying with the requirements in 30 TAC § 115.352(1).	
			Reciprocating Compressors Or Positive Displacement Pumps = The fugitive unit does not have reciprocating compressors or positive displacement pumps used in natural gas/gasoline processing operations.	
			TVP 0.002 PSIA or Less = The fugitive unit does not have components or systems that contact a process fluid containing VOC having a true vapor pressure less than or equal to 0.002 psia at 68 degrees Fahrenheit.	
			TVP of Process Fluid VOC <= 0.044 PSIA AT 68° F = Process drains do not contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.	
			TVP of Process Fluid VOC <= 0.044 PSIA AT 68□° F = Open-ended valves or lines do not contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.	
			Complying with 30 TAC § 115.352(1) = Pump seals are complying with the requirements in 30 TAC § 115.352(1).	
			TVP of Process Fluid VOC <= 0.044 PSIA AT 68□° F = Compressor seals do not contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.	
			TVP of Process Fluid VOC > 0.044 PSIA AT 68° F = Process drains contact a process fluid containing VOC having a TVP greater than 0.044 psia at 68 degrees Fahrenheit.	
			Complying With § 115.352(1) = Compressor seals are complying with the requirements in 30 TAC § 115.352(1).	
GRP-FUG3	40 CFR Part 60,	60VV-03	Closed Vent (or Vapor Collection) Systems = The fugitive unit does not contain closed vent or vapor collection	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
	Subpart VV		systems.	_
			Compressors = The fugitive unit contains compressors.	
			Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices.	
			Equipment in VOC Service = The fugitive unit contains equipment designed to operate in VOC service.	
			Flare = The fugitive unit contains flares.	
			Pressure Relief Devices in Heavy or Light Liquid Service = Fugitive unit contains pressure relief devices in heavy or light liquid service.	
			Produces Chemicals = The fugitive unit is part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.	
			Pumps in Heavy Liquid Service = The fugitive unit does not contain pumps in heavy liquid service.	
			Sampling Connection Systems = The fugitive unit contains sampling connection systems.	
			Valves in Gas/Vapor or Light Liquid Service = The fugitive unit contains valves in gas/vapor or light liquid service.	
			Vapor Recovery System = The fugitive unit does not contain vapor recovery systems.	
			2.0% = The fugitive unit is not complying with an allowable percentage of valves leaking equal to or less than 2.0%.	
			Affected Facility = The fugitive unit is part of a facility that is an affected facility as defined in 40 CFR § 60.480(a)(2).	
			Equivalent Emission Limitation = No equivalent emission limitation is used for flares.	
			Vacuum Service = The fugitive unit does not contain equipment in vacuum service.	
			Construction/Modification Date = After January 5, 1981 and on or before November 7, 2006.	
			Equivalent Emission Limitation = No equivalent emission limitation is used for valves in gas/vapor or light liquid service.	
			VOC Service = Fugitive unit does not contain equipment designed to operate in VOC service less than 300 hours per year.	
			Compliance Option = Choosing to comply with the provisions of 40 CFR Part 60, Subpart VV.	
			Complying with 40 CFR § 60.482-10 = Flares are complying with § 60.482-10.	
			Complying with 40 CFR § 60.482-3 = Compressors are complying with § 60.482-3.	
			Complying with 40 CFR § 60.482-5 = Sampling connection systems are complying with § 60.482-5.	
			Complying with 40 CFR § 60.482-8 = Pressure relief devices in heavy or light liquid service are complying with the requirements of § 60.482-8.	
			Pumps in Light Liquid Service = The fugitive unit contains pumps in light liquid service.	
			Complying with 40 CFR § 60.482-7 = Valves in gas/vapor or light liquid service are complying with § 60.482-7.	
			Design Capacity = Site with a design capacity is greater than or equal to 1,000 Mg/yr.	
			Equivalent Emission Limitation = No equivalent emission limitation is used for pumps in light liquid service.	
			Flanges and Other Connectors = The fugitive unit contains flanges and other connectors.	
			Open-ended Valves or Lines = The fugitive unit contains open-ended valves or lines.	
			Pressure Relief Devices in Gas/Vapor Service = The fugitive unit contains pressure relief devices in gas/vapor service.	
			Valves in Heavy Liquid Service = The fugitive unit contains valves in heavy liquid service.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Equivalent Emission Limitation = No equivalent emission limitation is used for flanges and other connectors.	
			Produces Heavy Liquid Chemicals = The facility produces chemicals other than or in addition to heavy liquid chemicals only from heavy liquid feed or raw materials.	
			Beverage Alcohol Production = The facility does not produce only beverage alcohol.	
			Complying with 40 CFR § 60.482-2 = Pumps in light liquid service are complying with § 60.482-2.	
			Complying with 40 CFR § 60.482-6 = Open-ended valves or lines are complying with § 60.482-6.	
			Complying with 40 CFR § 60.482-8 = Flanges and other connectors are complying with § 60.482-8.	
			Equipment in VOC Service = The facility does not contain equipment designed to operate in VOC service.	
GRP-FUG3	40 CFR Part 60,	6oVVa	Compressors = Fugitive unit contains compressors.	
	Subpart VVa		CVS = Fugitive unit does not contain closed vent systems.	
			Enclosed Combustion Device = Fugitive unit does not contain an enclosed combustion device.	
			Flare = Fugitive unit contains flares.	
			Pressure Relief Devices in Heavy or Light Liquid Service = Fugitive unit does not contain pressure relief devices in heavy or light liquid service.	
			Produces Chemicals = The facility produces, as an intermediate or final product, one or more of the chemicals listed in 40 CFR § 60.489a.	
			Pumps in Heavy Liquid Service = Fugitive unit does not contain pumps in heavy liquid service.	
			Pumps in Light Liquid Service = Fugitive unit contains pumps in light liquid service.	
			Sampling Connection Systems = Fugitive unit contains sampling connection systems.	
			Valves in Gas/Vapor or Light Liquid Service = Fugitive unit contains valves in gas/vapor or light liquid service.	
			Vapor Recovery System = Fugitive unit does not contain vapor recovery system.	
			2.0 % = The owner or operator is not electing to comply with an allowable percentage of valves leaking equal to or less than 2.0%.	
			Affected Facility = The facility is an affected facility as defined in 40 CFR § 60.480a(a)(2).	
			EEL = No equivalent emission limitation is used for sampling connection systems.	
			Construction/Modification Date = After November 7, 2006.	
			EEL = No equivalent emission limitation is used for valves in gas/vapor or light liquid service.	
			Compliance Option = Choosing to comply with the provisions of 40 CFR Part 60, Subpart VVa.	
			Complying with 60.482-10a = Flares are complying with 60.482-10a.	
			Complying with 60.482-2a = Pumps in light liquid service are complying with the requirements of § 60.482-2a.	
			Complying with 60.482-3a = Compressors are complying with the requirements of § 60.482-3a.	
			Complying with 60.482-5a = Sampling connection systems are complying with the requirements of § 60.482-5a.	
			Complying with 60.482-7a = Valves in gas/vapor or light liquid service are complying with the requirements of § 60.482-7a.	
			Connectors in Heavy Liquid Service = Fugitive unit contains connectors in heavy liquid service.	
			Design Capacity = Site with a design capacity greater than or equal to 1,000 Mg/yr.	
			Open-Ended Valves = Fugitive unit contains open-ended valves.	
			Pressure Relief Devices in Gas/Vapor Service = Fugitive unit contains pressure relief devices in gas/vapor service.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Valves in Heavy Liquid Service = Fugitive unit contains valves in heavy liquid service.	
			EEL = No equivalent emission limitation is used for valves in heavy liquid service.	
			Facility Type = Facility does not qualify for one of the exemptions in § 60.480a(d).	
			Complying with $60.482-6a$ = Open-ended valves are complying with the requirements of § $60.482-6a$ .	
			Complying with 60.482-8a = Valves in heavy liquid service are complying with the requirements of § 60.482-8a.	
SULFOXCHLR	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	R5352	Title 30 TAC § 115.352 Applicable = Site is not a petroleum refinery, synthetic organic chemical, polymer resin or methyl tert-butyl ether manufacturing process nor a natural gas/gasoline processing operation as defined in 30 TAC 115.10.	
SULFOXCHLR	40 CFR Part 60, Subpart VV	60VV-02	Produces Chemicals = The fugitive unit is not part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.	
SULFOX-CT	40 CFR Part 63, Subpart Q	63Q	Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.	
D226	30 TAC Chapter	R5121-1	Alternate Control Requirement = Alternate control is not used.	
	115, Vent Gas Controls		Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
			Total Design Capacity = Total design capacity is greater than or equal to 1,100 tons per year for all chemicals produced within that unit.	
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Flow Rate or VOC Concentration = Flow rate is greater than or equal to 0.011 scm/min or the VOC concentration is greater than or equal to 500 ppmv.	
			40 CFR 60 Subpart NNN Requirements = The distillation unit vent gas stream satisfies neither of the following requirements of 40 CFR Part 60, Subpart NNN: TRE index value is greater than 8.0; or TRE index value is greater than 1.0 without the use of VOC emission control devices.	
			Control Device Type = Smokeless flare	
			Vent Type = Vent gas stream originates from a synthetic organic chemical manufacturing industry reactor process or distillation operation, as defined in 30 TAC § 115.10.	
			40 CFR 60 Subpart RRR Requirements = The reactor process vent gas stream satisfies neither of the following requirements of 40 CFR Part 60, Subpart RRR: TRE index value is greater than 8.0; or TRE index value is greater than 1.0 without the use of VOC emission control devices.	
			VOC Concentration = VOC concentration is greater than or equal to 612 ppmv.	
D226	30 TAC Chapter	R-5121-2	Alternate Control Requirement = Alternate control is not used.	
	115, Vent Gas Controls	s, Vent Gas	Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C).	
			Vent Type = Vent gas stream originates from a synthetic organic chemical manufacturing industry reactor process or distillation operation, as defined in 30 TAC § 115.10.	
D226	30 TAC Chapter	R5121-3	Alternate Control Requirement = Alternate control is not used.	
	115, Vent Gas Controls		Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
			Total Design Capacity = Total design capacity is greater than or equal to 1,100 tons per year for all chemicals	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			produced within that unit.	_
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Flow Rate or VOC Concentration = Flow rate is greater than or equal to 0.011 scm/min or the VOC concentration is greater than or equal to 500 ppmv.	
			40 CFR 60 Subpart NNN Requirements = The distillation unit vent gas stream satisfies neither of the following requirements of 40 CFR Part 60, Subpart NNN: TRE index value is greater than 8.0; or TRE index value is greater than 1.0 without the use of VOC emission control devices.	
			Control Device Type = Vapor recovery system, as defined in 30 TAC § 115.10, other than an afterburner, blast furnace combustion device, boiler, catalytic or direct flame incinerator, carbon adsorption system, chiller, flare or vapor combustor.	
			Vent Type = Vent gas stream originates from a synthetic organic chemical manufacturing industry reactor process or distillation operation, as defined in 30 TAC § 115.10.	
			40 CFR 60 Subpart RRR Requirements = The reactor process vent gas stream satisfies neither of the following requirements of 40 CFR Part 60, Subpart RRR: TRE index value is greater than 8.0; or TRE index value is greater than 1.0 without the use of VOC emission control devices.	
	VOC Concentration = VOC concentration is greater than or equal to 612 ppmv.			
D3023		Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.  Total Design Capacity = Total design capacity is greater than or equal to 1,100 tons per year for all chemicals produced within that unit.  Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.  Flow Rate or VOC Concentration = Flow rate is greater than or equal to 0.011 scm/min or the VOC concentration is greater than or equal to 500 ppmv.  40 CFR 60 Subpart NNN Requirements = The distillation unit vent gas stream satisfies neither of the following	Alternate Control Requirement = Alternate control is not used.	
	115, Vent Gas Controls			
			Flow Rate or VOC Concentration = Flow rate is greater than or equal to 0.011 scm/min or the VOC concentration is greater than or equal to 500 ppmv.	
			requirements of 40 CFR Part 60, Subpart NNN: TRE index value is greater than 8.0; or TRE index value is greater	
			Control Device Type = Smokeless flare	
		or distilla 40 CFR 6 requirem	Vent Type = Vent gas stream originates from a synthetic organic chemical manufacturing industry reactor process or distillation operation, as defined in 30 TAC § 115.10.	
			40 CFR 60 Subpart RRR Requirements = The reactor process vent gas stream satisfies neither of the following requirements of 40 CFR Part 60, Subpart RRR: TRE index value is greater than 8.0; or TRE index value is greater than 1.0 without the use of VOC emission control devices.	
			VOC Concentration = VOC concentration is greater than or equal to 612 ppmv.	
D3023	30 TAC Chapter	R-5121-2	Alternate Control Requirement = Alternate control is not used.	
	115, Vent Gas Controls		Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least $1300^{\circ}$ F ( $704$ C).	
			$\label{prop:process} \begin{tabular}{ll} Vent Type = Vent gas stream originates from a synthetic organic chemical manufacturing industry reactor process or distillation operation, as defined in 30 TAC § 115.10. \end{tabular}$	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
D3023	30 TAC Chapter R5121-3		Alternate Control Requirement = Alternate control is not used.	
	115, Vent Gas Controls		Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
			Total Design Capacity = Total design capacity is greater than or equal to 1,100 tons per year for all chemicals produced within that unit.	
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Flow Rate or VOC Concentration = Flow rate is greater than or equal to 0.011 scm/min or the VOC concentration is greater than or equal to 500 ppmv.	
			40 CFR 60 Subpart NNN Requirements = The distillation unit vent gas stream satisfies neither of the following requirements of 40 CFR Part 60, Subpart NNN: TRE index value is greater than 8.0; or TRE index value is greater than 1.0 without the use of VOC emission control devices.	
			Control Device Type = Vapor recovery system, as defined in 30 TAC § 115.10, other than an afterburner, blast furnace combustion device, boiler, catalytic or direct flame incinerator, carbon adsorption system, chiller, flare or vapor combustor.	
			Vent Type = Vent gas stream originates from a synthetic organic chemical manufacturing industry reactor process or distillation operation, as defined in 30 TAC § 115.10.	
			40 CFR 60 Subpart RRR Requirements = The reactor process vent gas stream satisfies neither of the following requirements of 40 CFR Part 60, Subpart RRR: TRE index value is greater than 8.0; or TRE index value is greater than 1.0 without the use of VOC emission control devices.	
			VOC Concentration = VOC concentration is greater than or equal to 612 ppmv.	
PAINT-1	30 TAC Chapter 115, Surface	R5421	Alternate Requirements = No alternate requirement to 30 TAC §§ 115.421(a)(9) or 115.421(b)(8) has been approved or no alternate has been requested.	
	Coating Operations		Alternative Compliance Method = No alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria has been approved by the TCEQ Executive Director or no such alternate has been requested.	
			Facility Operations = Other miscellaneous metal parts and products coating.	
			Miscellaneous Coating Type = Coating type other than low-bake coatings, coating using air or forced air dryers, extreme performance and clear coat/interior protective coating for pails and drums.	
			VOC Emission Rate = All surface coating operations on a property, when uncontrolled, emit a combined weight of less than 100 lb/24-hr period of VOC and approval per 30 TAC § 115.427(a)(3)(B) has been received.	
REACT ACRO	40 CFR Part 60,	part III Affected I TRE Inde	Construction/Modification Date = After October 21, 1983.	
	Subpart III		Affected Facility = Air oxidation reactor not discharging its vent stream into a recovery system.	
			TRE Index Value = TRE index value is not calculated or claimed for exemption in 40 CFR § 60.610(c).	
			Control Device = Compliance demonstration with control devices other than an incinerator, boiler, process heater, or flare has been approved by the EPA Administrator.	
REACT ACRO	40 CFR Part 60, Subpart RRR	60RRR	Chemicals Listed in 40 CFR § 60.707 = The affected facility is not part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate.	

<sup>\* -</sup> The "unit attributes" or operating conditions that determine what requirements apply
\*\* - Notes changes made to the automated results from the DSS, and a brief explanation why

#### **NSR Versus Title V FOP**

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification	For initial permit with application shield, can be issued
of an existing facility	after operation commences; significant revisions require
	approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not
	authorize new emissions
Ensures issued permits are protective of the	Applicable requirements listed in permit are used by the
environment and human health by conducting a	inspectors to ensure proper operation of the site as
health effects review and that requirement for	authorized. Ensures that adequate monitoring is in
best available control technology (BACT) is	place to allow compliance determination with the FOP.
implemented.	
Up to two Public notices may be required.	One public notice required. Opportunity for public
Opportunity for public comment and contested	comments. No contested case hearings.
case hearings for some authorizations.	
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources
	identified by the EPA.
Applies to facilities: a portion of site or individual	One or multiple FOPs cover the entire site (consists of
emission sources	multiple facilities)
Permits include terms and conditions under	Permits include terms and conditions that specify the
which the applicant must construct and operate	general operational requirements of the site; and also
its various equipment and processes on a facility	include codification of all applicable requirements for
basis.	emission units at the site.
Opportunity for EPA review for Federal	Opportunity for EPA review, Affected states review, and
Prevention of Significant Deterioration (PSD)	a Public petition period for every FOP.
and Nonattainment (NA) permits for major	
sources.	
Permits have a table listing maximum emission	Permit has an applicable requirements table and
limits for pollutants	Periodic Monitoring (PM) / Compliance Assurance
	Monitoring (CAM) tables which document applicable
	monitoring requirements.
Permits can be altered or amended upon	Permits can be revised through several revision
application by company. Permits must be issued	processes, which provide for different levels of public
before construction or modification of facilities	notice and opportunity to comment. Changes that would
can begin.	be significant revisions require that a revised permit be
NOD 's ' 1' 1 1 1 4 COO	issued before those changes can be operated.
NSR permits are issued independent of FOP	FOP are independent of NSR permits, but contain a list
requirements.	of all NSR permits incorporated by reference

### **New Source Review Requirements**

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The

Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical\_rules/old106list/index106.html

Outdated Standard Exemption lists may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical rules/oldselist/se index.html

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

www.tceq.texas.gov/permitting/air/nav/air\_status\_permits.html

Prevention of Significant Deterioration (PSD) Permits					
PSD Permit No.: PSDTX1016M1	Issuance Date: 07/15/2015				
Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.					
Authorization No.: 865A Issuance Date: 07/15/2015					
Permits By Rule (30 TAC Chapter 106) for the Application Area					
Number: 106.452	Version No./Date: 09/04/2000				
Number: 106.454	Version No./Date: 11/01/2001				
Number: 106.474	Version No./Date: 09/04/2000				
Number: 106.511	Version No./Date: 09/04/2000				

#### **Emission Units and Emission Points**

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

# **Monitoring Sufficiency**

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

# Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

# **Compliance Assurance Monitoring (CAM):**

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

- 1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;
- 2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and
- 3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

Unit/Group/Process Information					
ID No.: D226					
Control Device ID No.: FLARE	Control Device Type: Flare				
Applicable Regulatory Requirement					
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-1				
Pollutant: VOC Main Standard: § 115.122(a)(2)					
Monitoring Information					
Indicator: Net Heating Value					
Minimum Frequency: Once per day					
Averaging Period: n/a*					
Deviation Limit: Minimum net heating value of the gas combusted is less than 200 Btu/scf.					
Racis of CAM: A common way to monitor a flare is by measuring inlet flow rate and calculating the net					

Basis of CAM: A common way to monitor a flare is by measuring inlet flow rate and calculating the net heating value of emissions routed to the flare. If the flow rate is too high or if the net heating value is too low, the flare may not maintain a flame or properly combust emissions. Also, measuring the flow rate and net heating value is consistent with the calculation of the net heating value in 40 CFR Part 60, Subpart A. Utilizing the procedures in 40 CFR Part § 60.18(f)(3) to calculate the net heating value of the gaseous fuels is consistent with 40 CFR Part 60, Subpart A.

<sup>\*</sup>The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information					
ID No.: D226					
Control Device ID No.: FLARE Control Device Type: Flare					
Applicable Regulatory Requirement					
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-1				
Pollutant: VOC	Main Standard: § 115.122(a)(2)				
Monitoring Information					
Indicator: Inlet Flow Rate					
Minimum Frequency: Once per day					
Averaging Period: n/a*					
Deviation Limit: A maximum inlet gas flow rate greater than 334 scf/sec (1.208 MMscf/hr).					
Basis of CAM: A common way to monitor a flare is by measuring inlet flow rate and calculating the net					

Basis of CAM: A common way to monitor a flare is by measuring inlet flow rate and calculating the net heating value of emissions routed to the flare. If the flow rate is too high or if the net heating value is too low, the flare may not maintain a flame or properly combust emissions. Also, measuring the flow rate and net heating value is consistent with the calculation of the net heating value in 40 CFR Part 60, Subpart A. Utilizing the procedures in 40 CFR Part § 60.18(f)(3) to calculate the net heating value of the gaseous fuels is consistent with 40 CFR Part 60, Subpart A.

<sup>\*</sup>The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information					
ID No.: D226					
Control Device ID No.: INCIN	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)				
Applicable Regulatory Requirement					
Name: 30 TAC Chapter 115, Vent Gas Controls SOP Index No.: R-5121-2					
Pollutant: VOC Main Standard: § 115.122(a)(2)					
Monitoring Information					
Indicator: Combustion Temperature / Exhaust Gas Temperature					
Minimum Frequency: once per day					
Averaging Period: n/a*					
Deviation Limit: The minimum combustion temperature is less than 1380 F.					
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's					

Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.

\*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information					
ID No.: D226					
Control Device ID No.: SULFOX-TO Control Device Type: Vapor Combustor					
Applicable Regulatory Requirement					
Name: 30 TAC Chapter 115, Vent Gas Controls SOP Index No.: R5121-3					
Pollutant: VOC Main Standard: § 115.122(a)(2)					
Monitoring Information					
Indicator: Combustion Temperature / Exhaust Gas Temperature					
Minimum Frequency: once per day					
Averaging Period: n/a*					
Deviation Limit: Minimum combustion temperature is less than 1650F.					
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's					

Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for vapor combustors. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.

\*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information		
ID No.: D3023		
Control Device ID No.: FLARE	Control Device Type: Flare	
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-1	
Pollutant: VOC	Main Standard: § 115.122(a)(2)	
Monitoring Information		
Indicator: Net Heating Value		
Minimum Frequency: Once per day		
Averaging Period: n/a*		
Deviation Limit: Minimum net heating value of the gas combusted is less than 200 Btu/scf.		
Basis of CAM: A common way to monitor a flare is by measuring inlet flow rate and calculating the net		

Basis of CAM: A common way to monitor a flare is by measuring inlet flow rate and calculating the net heating value of emissions routed to the flare. If the flow rate is too high or if the net heating value is too low, the flare may not maintain a flame or properly combust emissions. Also, measuring the flow rate and net heating value is consistent with the calculation of the net heating value in 40 CFR Part 60, Subpart A. Utilizing the procedures in 40 CFR Part § 60.18(f)(3) to calculate the net heating value of the gaseous fuels is consistent with 40 CFR Part 60, Subpart A.

<sup>\*</sup>The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information		
ID No.: D3023		
Control Device ID No.: FLARE	Control Device Type: Flare	
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-1	
Pollutant: VOC	Main Standard: § 115.122(a)(2)	
Monitoring Information		
Indicator: Inlet Flow Rate		
Minimum Frequency: Once per day		
Averaging Period: n/a*		
Deviation Limit: A maximum inlet gas flow rate greater than 334 scf/sec (1.208 MMscf/hr).		
Basis of CAM: A common way to monitor a flare is by measuring inlet flow rate and calculating the net		

Basis of CAM: A common way to monitor a flare is by measuring inlet flow rate and calculating the net heating value of emissions routed to the flare. If the flow rate is too high or if the net heating value is too low, the flare may not maintain a flame or properly combust emissions. Also, measuring the flow rate and net heating value is consistent with the calculation of the net heating value in 40 CFR Part 60, Subpart A. Utilizing the procedures in 40 CFR Part § 60.18(f)(3) to calculate the net heating value of the gaseous fuels is consistent with 40 CFR Part 60, Subpart A.

<sup>\*</sup>The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information		
ID No.: D3023		
Control Device ID No.: INCIN	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)	
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R-5121-2	
Pollutant: VOC	Main Standard: § 115.122(a)(2)	
Monitoring Information		
Indicator: Combustion Temperature / Exhaust Gas Temperature		
Minimum Frequency: once per day		
Averaging Period: n/a*		
Deviation Limit: The minimum combustion temperature is less than 1380 F.		
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's		

Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.

\*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information		
ID No.: D3023		
Control Device ID No.: SULFOX-TO	Control Device Type: Vapor Combustor	
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-3	
Pollutant: VOC	Main Standard: § 115.122(a)(2)	
Monitoring Information		
Indicator: Combustion Temperature / Exhaust Gas Temperature		
Minimum Frequency: once per day		
Averaging Period: n/a*		
Deviation Limit: Minimum combustion temperature is less than 1650F.		
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's		

Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for vapor combustors. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.

\*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information		
ID No.: REACT ACRO		
Control Device ID No.: SULFOX-TO	Control Device Type: Vapor Combustor	
Applicable Regulatory Requirement		
Name: 40 CFR Part 60, Subpart III	SOP Index No.: 60III	
Pollutant: VOC/TOC	Main Standard: § 60.612(a)	
Monitoring Information		
Indicator: Combustion Temperature / Exhaust Gas Temperature		
Minimum Frequency: four times per hour		
Averaging Period: one hour		
Deviation Limit: Minimum temperature is less than 1650F.		

Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.

#### **Periodic Monitoring:**

30 TAC Chapter 115.

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

<b>Unit/Group/Process Information</b>		
ID No.: GRP-HFR		
Control Device ID No.: SULFOX-TO	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)	
Applicable Regulatory Requirement		
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb	
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)	
Monitoring Information		
Indicator: Combustion Temperature / Exhaust Gas Temperature		
Minimum Frequency: Once per week		
Averaging Period: n/a*		
Deviation Limit: Minimum combustion temperature not less than 1650 F.		
Basis of monitoring: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below		

\*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and

Compliance Review
1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on March 9, 2016.
Site rating: <u>17.69 / Satisfactory</u> Company rating: <u>3.26 / Satisfactory</u>
(High $< 0.10$ ; Satisfactory $\ge 0.10$ and $\le 55$ ; Unsatisfactory $> 55$ )
2. Has the permit changed on the basis of the compliance history or site/company rating?
Site/Permit Area Compliance Status Review
1. Were there any out-of-compliance units listed on Form OP-ACPS?No
2. Is a compliance plan and schedule included in the permit?
Available Unit Attribute Forms
OP-UA1 - Miscellaneous and Generic Unit Attributes
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes
OP-UA3 - Storage Tank/Vessel Attributes
OP-UA4 - Loading/Unloading Operations Attributes
OP-UA5 - Process Heater/Furnace Attributes
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes
OP-UA7 - Flare Attributes
OP-UA8 - Coal Preparation Plant Attributes
OP-UA9 - Nonmetallic Mineral Process Plant Attributes
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes
OP-UA11 - Stationary Turbine Attributes
OP-UA12 - Fugitive Emission Unit Attributes
OP-UA13 - Industrial Process Cooling Tower Attributes
OP-UA14 - Water Separator Attributes
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
OP-UA16 - Solvent Degreasing Machine Attributes
OP-UA17 - Distillation Unit Attributes
OP-UA18 - Surface Coating Operations Attributes
OP-UA19 - Wastewater Unit Attributes
OP-UA20 - Asphalt Operations Attributes
OP-UA21 - Grain Elevator Attributes
OP-UA22 - Printing Attributes
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
OP-UA25 - Synthetic Fiber Production Attributes
OP-UA26 - Electroplating and Anodizing Unit Attributes
OP-UA27 - Nitric Acid Manufacturing Attributes
OP-UA28 - Polymer Manufacturing Attributes
OP-UA29 - Glass Manufacturing Unit Attributes OP UA29 - Wroth Sode Sulfite and Stand Alone Somichemical Pulp Mill Attributes
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
OP-UA31 - Lead Smelting Attributes OP UA32 - Copper and Zing Smelting / Process and Propage Production Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes OP-UA33 - Metallic Mineral Processing Plant Attributes
OP-UA34 - Pharmaceutical Manufacturing
OP-UA35 - Incinerator Attributes
OP-UA36 - Steel Plant Unit Attributes
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes
OP-UA40 - Ferroalloy Production Facility Attributes
OP-UA41 - Dry Cleaning Facility Attributes
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-IIA42 - Sulfuric Acid Production Attributes

- OP-UA44 Municipal Solid Waste Landfill/Waste Disposal Site Attributes
- OP-UA45 Surface Impoundment Attributes
- OP-UA46 Epoxy Resins and Non-Nylon Polyamides Production Attributes
- OP-UA47 Ship Building and Ship Repair Unit Attributes
- OP-UA48 Air Oxidation Unit Process Attributes
- OP-UA49 Vacuum-Producing System Attributes
- OP-UA50 Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
- OP-UA51 Dryer/Kiln/Oven Attributes
- OP-UA52 Closed Vent Systems and Control Devices
- OP-UA53 Beryllium Processing Attributes
- OP-UA54 Mercury Chlor-Alkali Cell Attributes
- OP-UA55 Transfer System Attributes
- OP-UA56 Vinyl Chloride Process Attributes
- OP-UA57 Cleaning/Depainting Operation Attributes
- **OP-UA58 Treatment Process Attributes**
- OP-UA59 Coke By-Product Recovery Plant Attributes
- OP-UA60 Chemical Manufacturing Process Unit Attributes
- OP-UA61 Pulp, Paper, or Paperboard Producing Process Attributes
- OP-UA62 Glycol Dehydration Unit Attributes
- OP-UA63 Vegetable Oil Production Attributes